

HEARING DATE AND TIME: May 12, 2006 at 10:00 a.m.
OBJECTION DEADLINE: May 5, 2006

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re: :
: Chapter 11
DELPHI CORPORATION, INC., et al., : Case No.: 05-44481 (RDD)
:
Debtors. : (Jointly Administered)
:
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**NOTICE OF MOTION OF DANE SYSTEMS, LLC FOR
ADEQUATE PROTECTION PURSUANT TO 11 U.S.C. § 361**

PLEASE TAKE NOTICE that upon the annexed motion (the "Motion"), Dane Systems, LLC, through its undersigned counsel (the "Movant") will move for an order providing adequate protection pursuant to § 361 of Title 11 of the United States Code (the "Bankruptcy Code"), as more fully described in the Motion, at a hearing before the Honorable Robert D. Drain, United States Bankruptcy Judge, in Room 610 of the United States Bankruptcy Court for the Southern District of New York, Alexander Hamilton U.S. Custom House, One Bowling Green, New York, New York 10004, on May 12, 2006, at 10:00 a.m., or as soon thereafter as counsel may be heard.

PLEASE TAKE FURTHER NOTICE that because this Motion does not raise any novel issues of law Movants request that the Court waive the requirement that they file a separate memorandum of law under Local Rule 9013-1.

PLEASE TAKE FURTHER NOTICE that any responses or objections to the Motion:

(a) must be in writing; (b) shall conform to the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the Southern District of New York and the Supplemental Order Under 11 U.S.C. Sections 102(1) and 105 and Fed. R. Bankr. P. 2002(m), 9006, 9007, and 9014 Establishing Omnibus Hearing Dates and Certain Notice, Case Management, and Administrative

Procedures (“Supplemental Case Management Order”); (c) must be filed with the Bankruptcy Court electronically in accordance with General Order M-242 (as amended)(which can be found at www.nysb.uscourts.gov) by registered users of the Bankruptcy Court’s case filing system and, by all other parties in interest, on a 3.5 inch disk, preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format; (d) must be submitted in hard-copy, delivered directly to the chambers of Honorable Robert D. Drain, United States Bankruptcy Judge, and (e) must be served in accordance with General Order M-242, and shall further be served upon (i) co-counsel for Dane Systems LLC, Warner Norcross & Judd LLP, 900 Fifth Third Center, 111 Lyons Street, N.W., Grand Rapids, Michigan 49503 (Attn: Michael O’Neal, Esq.), (ii) co-counsel for Dane Systems LLC, Duane Morris LLP, 744 Broad Street, Newark, New Jersey, 07102 (Attn: Joseph H. Lemkin, Esq.); (iii) Delphi Corporation, 5725 Delphi Drive, Troy, Michigan 48098 (Attn: General Counsel), (iv) counsel to the Debtors, Skadden, Arps, Slate, Meagher & Flom LLP, 333 West Wacker Drive, Suite 2100, Chicago, Illinois 60606 (Attn: John W. Butler, Jr., Esq.), (v) counsel for the agent under the Debtors’ pre-petition credit facility, Simpson Thacher & Bartlett LP, 425 Lexington Avenue, New York, NY 10017 (Att: Kenneth S. Zimar, Esq.), (vi) counsel for the agent under the postpetition credit facility, Davis Polk & Wardwell, 450 Lexington Avenue, New York, New York 10017 (Att: Marlane Mellican, Esq.), (vii) counsel for the Official Committee of Unsecured Creditors, Latham & Watkins, 885 Third Avenue, New York, New York 10022 (Att: Mark A. Broude, Esq. and (vii) the Office of the United States Trustee for the Southern District of New York, 33 Whitehall Street, Suite 2100, New York, New York 10004 (Attn: Alicia M. Leonhard, Esq.), so as to be received no later than 4:00 p.m. (Prevailing Eastern Time) on May 5, 2006 (the “Objection Deadline”)

PLEASE TAKE FURTHER NOTICE that only those objections made in writing, in accordance with the Supplemental Case Management Order, and timely filed and received by the Objection Deadline will be considered by the Bankruptcy Court at the Hearing. If no objections to the Motion are timely filed and served in accordance with the procedures set forth herein, the Bankruptcy Court may enter an order granting the Motion without further notice.

Dated: Newark, New Jersey
April 20, 2006

DUANE MORRIS LLP
A Delaware Limited Liability Partnership
Attorneys for the Movant

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- and -

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